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June 21, 2005

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Mary Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, Mass. 02110

RE: Bay State Gas, DTE 05-27 – notice of intent to sponsor witnesses

Dear Secretary Cottrell:

Please accept the following late notice of intent to sponsor witnesses pursuant to the direction and leave of the Hearing Officer. During the course of the discovery period, it has become clear that there is a need for additional evidence regarding the operation of Bay State's Springfield Call Center. Although this notice is 13 days beyond the deadline stated in the Hearing Officer's procedural schedule, the United Steelworkers of America ("USWA") submits that this notice will not unduly prejudice any of the parties or interveners, as the deadline for noticing witnesses was only announced 11 days ago on June 10, 2005, and the deadline for pre-filed written testimony for all intervenor witnesses remains over two weeks away.

The USWA sets forth below that it intends to sponsor 1-5 witnesses in this proceeding who will testify with regard to the operations of the Springfield Massachusetts Call Center, working conditions at the Call Center, and any impacts on the Springfield community with regard to outsourcing. This notice is on the understanding that it represents the USWA's current intent only; the USWA may sponsor fewer, or more, witnesses than set forth in this notice. The USWA will update this notice as, and if, its intent changes.

Respectfully submitted,

UNITED STEELWORKERS OF  
AMERICA, AFL-CIO/CLC,  
By its attorney,

/s/ Nicole Horberg Decter  
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cc: Hearing Officer  
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